

From: [spill12](#)
To: [Mike Gaudet](#)
Cc: [spill12](#); [Adams, Adam](#); [ITC Incident](#); [Brent Weber](#); [Nicole Bealle](#); [Moore, Gary](#)
Subject: RE: 20190417_Stormwater Discharge response information
Date: Wednesday, April 17, 2019 6:42:21 PM
Attachments: [ATT00001.txt](#)
[Stormwater Discharge response information.msg](#)

Mike,

As noted, if the analytical is within permit limits, no approval to discharge is necessary only the confirmation information provided as noted. ITC can proceed as noted. If the results are outside of the discharge parameters, the TCEQ is to be notified of the results for review and evaluation of the results to assess a discharge option.

1. ITC collect a sample and perform in-house analysis for pH and COD: *this should be done prior to the outfall in anticipation of a discharge to manage non-contact fire water.*
2. ITC document the results on a daily check sheet: *see above*
3. If the results are within the permitted limits, ITC email the daily check sheets with results to the Spill12 email address and commence discharging at ITC's discretion. *(yes)*

The initial volume request is necessary to coordinate with the water recovery group prior to discharge and can be the best estimate amount.



From: Mike Gaudet <MGaudet@item.com>

Sent: Wednesday, April 17, 2019 1:21 PM

To: spill12 <spill12@tceq.texas.gov>; adams.adam@epa.gov; ITC Incident <itcincident@item.com>; Brent Weber <bweber@item.com>; Nicole Bealle <Nicole.Bealle@tceq.texas.gov>; Mike Gaudet <MGaudet@item.com>; Guadalupe Quiroz <guadalupe.quiroz@tceq.texas.gov>

Subject: 20190417_Stormwater Discharge response information

Thank you for considering this request. ITC would like to clarify on issue and specifically request that the process below be followed in lieu of the attached, more specifically:

1. Request to eliminate the initial volume request. These events tend to be rainfall dependent, and the requests are normally in the beginning of the event – therefore volume information tends to be of little value.
2. Please clarify if we are awaiting "approval" to start the discharge, or if it can be initiated when the highlighted information below is provided. It is ITC's understanding that we are awaiting approval.

Thank you!

Michael Gaudet

From: spill12 [<mailto:spill12@tceq.texas.gov>]

Sent: Tuesday, April 16, 2019 7:25 PM

To: Mike Gaudet

Cc: adams.adam@epa.gov; spill12; ITC Incident; Brent Weber; Nicole Bealle

Subject: RE: 20190416_Stormwater Discharge response information

Good evening,

No further concurrence is necessary. Make sure that you follow the representations stated in the attached email.

Thank you



Guadalupe Quiroz
Waste Section Team Leader
Texas Commission on Environmental Quality
5425 Polk Street, Ste. H
Houston, TX 77023
Phone 713.767.3608

From: Mike Gaudet <MGaudet@item.com>

Sent: Tuesday, April 16, 2019 9:28 AM

To: spill12 <spill12@tceq.texas.gov>; ITC Incident <itcincident@item.com>; Brent Weber <bweber@item.com>; Nicole Bealle <Nicole.Bealle@tceq.texas.gov>

Cc: adams.adam@epa.gov; Mike Gaudet <MGaudet@item.com>

Subject: 20190416_Stormwater Discharge response information

ITC would like to request a simplified procedure to authorize discharges from the TPDES permitted stormwater outfalls, excluding Outfall 003. These outfalls are currently authorized to discharge stormwater and are not impacted by the incident. In short, we would like to address these discharges as follows:

1. ITC conduct a visual inspection of the collected water in the tank farm
2. ITC collect a sample and perform in-house analysis for pH and COD
3. ITC document the results on a daily check sheet
4. If the results are within the permitted limits, ITC email the daily check sheet with results to the Spill 12 email address and commence discharging at ITC's discretion.
5. ITC follow all existing TPDES permit requirements for the affected outfalls

The basis of this request is to ensure that these outfalls can be opened in a timely manner during major rain events. This has been discussed in detail with TCEQ staff in recent meetings here at the UC location. We greatly appreciate your consideration of this matter.

Regards,

Mike Gaudet

From: spill12 [<mailto:spill12@tceq.texas.gov>]

Sent: Friday, April 05, 2019 10:19 PM

To: Mike Gaudet; Brent Weber

Cc: Nicole Bealle; Travis Lay

Subject: Follow-up on TCEQ Requests

Mike and Brent,

Just following up on the below requests and questions that TCEQ has made in the last few days that still remain outstanding. Please get with Travis first thing in the morning to provide a status update on these issues and/or answers regarding the below items as they are high priorities for the agency.

- The original tank volumes of the impacted tanks, and the current volumes of where the tanks are at now
- Amounts removed from tanks thus far
- Where each tank has been pumped to thus far and how it has gotten there. Please include a map of conveyance (PIND Drawing) or description of conveyance.
- The tank volumes of all tanks being utilized for managing the waste that has been generated. (80-18, 60-1, 80-34, 100-31, 100-28, 100-15, 80-33, barge)
- Include what material was in each impacted tank

- Method of recovery & product transfer.
- Level of the separator and tank farm and location of where the material is being transferred to.
- And any other important information related to the tank farm, barges, frac tanks, roll offs, tanks holding waste.

1. Regarding non-fire impacted stormwater management:

- Provide a volume of accumulated non-fire impacted stormwater.

There is no significant accumulation of non-fire impacted stormwater currently being managed onsite. Accumulation of this material is typically rainfall dependent.

- Prior to discharging stormwater, ITC is to conduct pre-sampling of the water to be discharged from the non-fire impacted area(s). ITC must demonstrate that no contaminants related to the fire or firefighting activities will impact the discharge and that only discharges allowed by the facility's TPDES permit will be discharged from this outfall. Provide pre-discharge sample results to the TCEQ via the command structure. TCEQ received analysis results of samples for stormwater that we understand is intended to be released through outfall 005 with a COD of approximately 20 mg/L. This meets COD limits and may be released after meeting the other requirements listed here (provide volume and coordinate the discharge).

Understood

- Coordinate any stormwater discharge with the surface water recovery group prior to discharge.

Understood

2. Regarding the request of 4/4/19 to have a temporary alternate discharge location (attached) for non-impacted stormwater:

- Provide pre-discharge non-fire impacted area stormwater sample results for the standard stormwater parameters.

Understood

- Prior to discharge, coordinate with the surface water recovery group.

Understood

- The TCEQ has no objections with a temporary re-routing of this stormwater away from outfall 003 and allowing the discharge as proposed.

Understood

Thank you,

Kendra Bernhagen

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